

KEVIN V. RYAN (CSBN 118321)
 United States Attorney
 EUMI L. CHOI (WVBN 0722)
 Chief, Criminal Division
 CHRISTINA HUA (CSBN 185358)
 CYNTHIA STIER (DCBN 423256)
 Assistant United States Attorneys
 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102-3495
 Telephone: (415) 436-7534
 FAX: (415) 436-7234
 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
 Plaintiff,
 v.
 RENATO MENDOZA MEDINA,
 a/k/a Rene Mendoza Medina,
 PHYLLIS REYES CUISON,
 a/k/a Phyllis Cundangan Reyes, and
 RAWLIN CUNDANGAN REYES,
 Defendants.

No. CR 06-0144 JSW

**STIPULATION AND
~~PROPOSED~~ PROTECTIVE ORDER**

STIPULATION

The United States and the defendants in this action, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to each defendant's counsel of record in this matter discovery containing sensitive tax, personal and/or financial information of third parties, subject to the following conditions.

2. No defense counsel of record shall disclose any documents or information produced by the United States to anyone except his or her client, any defense witnesses, experts or investigators retained in this case, or any defense staff working on the case, and no defendant, defense witnesses, experts or investigators, or defense staff shall disclose such documents or

information to anyone, absent further order of the Court.

3. The documents and information described in paragraph 1 shall be used only to prepare and evaluate the defense in this proceeding. Any person to whom the documents or information are disclosed must be provided with a copy of this Stipulation and Order. The materials provided to defense counsel pursuant to this order, and any copies thereof, shall be returned to the government at the conclusion of this case.

4. The documents described above shall not be copied at all unless copying is necessary for preparation of the defense in this proceeding. Any copy of the materials that is made shall be accompanied at all times by a copy of this Stipulation and Order. No document or copy thereof shall be left with any defense witness.

DATED: 3/23/06

/S/ Christina Hua
CHRISTINA HUA
Assistant United States Attorney

DATED: 3/23/06

/S/ Cristina C. Arguedas
CRISTINA C. ARGUEDAS
Counsel for Renato Mendoza Medina

DATED: 3/23/06

/S/ Lidia Stiglich
LIDIA STIGLICH
Counsel for Rawlin Cundangan Reyes

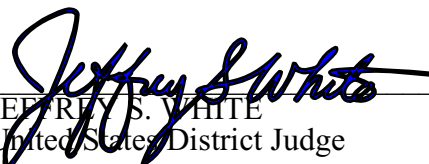
DATED: 3/23/06

/S/ Ann Moorman
ANN MOORMAN
Counsel for Phyllis Reyes Cuison

ORDER

In light of the stipulation and agreement of the parties to this action, and good cause appearing therefor, it is HEREBY ORDERED that disclosure of the above-described information shall be restricted as set forth in Paragraphs 1 through 4 above.

DATED: March 27, 2006


JEFFREY S. WHITE
United States District Judge